

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Global Brokerage, Inc. f/k/a FXCM,
Inc. Securities Litigation

Master File No. 1:17-cv-00916-RA

**DEFENDANTS' NOTICE OF
MOTION TO DISMISS SECOND
AMENDED CONSOLIDATED
SECURITIES CLASS ACTION
COMPLAINT**

CLASS ACTION

ORAL ARGUMENT REQUESTED

This Document Relates To: All Actions

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the Motion to Dismiss Second Amended Consolidated Securities Class Action Complaint and Declaration of Paul R. Bessette and exhibits thereto, Defendants Global Brokerage, Inc. f/k/a FXCM Inc., Dror Niv, William Ahdout and Robert Lande ("Defendants"), by and through their undersigned counsel, will move this Court before the Honorable Ronnie Abrams, United States District Judge for the Southern District of New York, 40 Foley Square, Room 2203, New York, New York, 10007, on such date as the Court will determine, for an order, pursuant to Federal Rules of Civil Procedure 12(f), 11(b)(3), and 12(b)(6), dismissing all claims asserted against Defendants in the Second Amended Consolidated Securities Class Action Complaint (ECF No. 111), and granting such other and further relief as the Court deems just and proper.

Dated: May 7, 2018

KING & SPALDING LLP

/s/ Paul R. Bessette

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Ahdout and Robert Lande*

CERTIFICATE OF SERVICE

I hereby certify that, on May 7, 2018, the foregoing Notice of Motion to Dismiss Second Amended Consolidated Securities Class Action Complaint was electronically delivered to all counsel of record via the Southern District of New York's CM/ECF system.

/s/ Paul R. Bessette

Paul R. Bessette